

Appendix B**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 7,014,336**

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
132	A lighting fixture for generating white-light, comprising: a plurality of component illumination sources including at least two white LEDs configured to generate electromagnetic radiation of at least two different spectrums; and a mounting holding said plurality, said mounting designed to allow said spectrums of said plurality to mix and form a resulting spectrum; wherein the visible portion of said resulting spectrum has intensity greater than <b>background noise</b> at its lowest spectral valley.	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required:  “electromagnetic radiation produced independent of the lighting fixture”	Indefinite
186	A method for generating light comprising: A) mounting a plurality of component illumination sources, including at least two white LEDs producing electromagnetic radiation of	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required:  “electromagnetic radiation produced independent of the lighting fixture”	Indefinite

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	<p>at least two different spectrums, in such a way as to mix the spectrums; and B) choosing said at least two different spectrums in such a way that the mix of the spectrums forms a resulting spectrum having an intensity greater than <b>background noise</b> at its lowest spectral valley within the photopic response of the human eye.</p>		

## PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 7,038,399

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
7	<p>An illumination apparatus, comprising:  at least one LED; and  at least one <b>controller</b> coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one <b>controller</b> further configured to provide power to the at least one LED based on the power-related signal, wherein the A.C. power source is an A.C. dimmer circuit,  wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one <b>controller</b> is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and  wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one <b>controller</b> is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.</p>	<p>Plain and ordinary meaning;  however, to the extent that the Court deems a construction is required: “A circuit or component that controls”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> </ul>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '399 Patent at 17:7-48.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<ul style="list-style-type: none"> <li>• variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
8	<p>The apparatus of claim 7, wherein the at least one parameter of the light that is variably controlled by the at least one <b>controller</b> in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit or component that controls”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal</li> <li>• variably control the at least one parameter of the light</li> </ul>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface wherein the one parameter includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light, variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to ’399 Patent at 17:7-48.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p>	

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		and/or structural equivalents thereof.	
17	<p>An illumination apparatus, comprising:  at least one LED; and  at least one <b>controller</b> coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one <b>controller</b> further configured to provide power to the at least one LED based on the power-related signal, wherein the A.C. power source is an A.C. dimmer circuit,  wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one <b>controller</b> is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and wherein the at least one <b>controller</b> includes:</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> </ul>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, and variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '399 Patent at 17:7-48.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification.</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
17	<p>an <b>adjustment circuit</b> to variably control the at least one parameter of light based on the varying power-related signal; and</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit that adjusts”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the</p>	<p>Means plus function term.</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: the components of adjustment circuit 208 that are</p>



CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>term is governed by § 112, ¶ 6:</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 6;</p> <p>(b) processor 102, power circuitry 108, and drive circuitry 109 as illustrated in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for power circuitry including the adjustment circuit 208 of FIG. 6) and described in the specification and either FIGs. 9 or 10 or 11 (for the drive circuitry) and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	<p>shown in FIG. 6 and structural equivalents thereof</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
17	<p><b>power circuitry</b> to provide at least the power to the at least one LED based on the varying power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “Components of a circuit that provides power”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112 ¶ 6. To the extent that the Court finds that the term is governed by § 112 ¶ 6, Signify has proposes the following alternate structure and function:</p> <p><b><u>Claims 17-18</u></b></p> <p>Functions: provide power to the at least one LED based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as illustrated in FIG. 3 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 4 and described in the specification, and</p>	<p>Means plus function term.</p> <p>Function: provide at least the power to the at least one LED based on the varying power related signal.</p> <p>Structure: Components in Fig. 6 (404, 408, 402), and their structural equivalents</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>as further illustrated in FIG. 5, including the exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) power circuitry 108 as illustrated in FIG. 7 and described in the specification, including the exemplary embodiments of power circuitry 108 as shown in FIG. 8 and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
18	<p>The apparatus of claim 17, wherein the <b>power circuitry</b> includes: a rectifier to receive the power-related signal and provide a rectified power-related signal; a low pass filter to filter the rectified power-related signal; and</p> <p>a DC converter to provide the power to at least the at least one LED based on the filtered rectified power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "Components of a circuit that provides power"</p> <p>Functions: provide power to the at least one LED based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408</p>	<p>Means plus function term.</p> <p>Function: provide at least the power to the at least one LED based on the varying power related signal.</p> <p>Structure: Components in Fig. 6 (404, 408, 402), and their structural equivalents</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>and DC converter 402 as illustrated in FIG. 3 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 4 and described in the specification, and as further illustrated in FIG. 5, including the exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) power circuitry 108 as illustrated in FIG. 7 and described in the specification, including the exemplary embodiments of power circuitry 108 as shown in FIG. 8 and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
19	<p>The apparatus of claim 18, wherein the <b>adjustment circuit</b> is coupled to the DC converter and is configured to variably control the at least one LED based on the filtered rectified power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit that adjusts"</p> <ul style="list-style-type: none"> <li>• variably control the at least one parameter of light based on the varying power-related</li> </ul>	<p>Means plus function term.</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: the components of adjustment circuit 208 that are</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>signal.</p> <ul style="list-style-type: none"> <li>• variably control the at least one LED based on the filtered rectified power-related signal.</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 6;</p> <p>(b) processor 102, power circuitry 108, and drive circuitry 109 as illustrated in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for power circuitry including the adjustment circuit 208 of FIG. 6) and described in the specification and either FIGs. 9 or 10 or 11 (for the drive circuitry) and described in the specification;</p> <p>and/or structural equivalents</p>	<p>shown in FIG. 6 and structural equivalents thereof</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		thereof.	
58	<p>An illumination apparatus, comprising:  at least one LED; and  at least one <b>controller</b> coupled to the at least one LED and configured to receive first power from an alternating current (A.C.) dimmer circuit, the A.C. dimmer circuit being controlled by a user interface to vary the first power, the at least one <b>controller</b> further configured to provide second power to the at least one LED based on the first power,  wherein:  the A.C. dimmer circuit includes a triac responsive to the user interface so as to variably control a duty cycle of an A.C. signal and thereby vary the first power; and</p> <p>the at least one <b>controller</b> is configured to provide the second power as a varying power to the at least one LED based on variations of the first power.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive first power from an alternating current (A.C.) dimmer circuit</li> <li>• provide second power to the at least one LED based on the first power</li> <li>• provide the second power as a varying power to the at least one LED based on variations of the first power</li> </ul> <p>Structure: may comprise any of the following:</p>	<p>Means plus function term.</p> <p>Function: receive first power from an alternating current (A.C.) dimmer circuit, provide second power to the at least one LED based on the first power, and provide the second power as a varying power to the at least one LED based on variations of the first power.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '399 Patent at 17:7-48.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
59	<p>An illumination apparatus, comprising: at least one LED; and at least one <b>controller</b> coupled to the at least one LED and configured to receive first power from an alternating current (A.C.) dimmer circuit, the A.C. dimmer circuit being controlled by a user interface to vary the first power, the at least one <b>controller</b> further configured to provide</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit or component that controls”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p>	<p>Means plus function term.</p> <p>Function: receive first power from an alternating current (A.C.) dimmer circuit, provide second power to the at least one LED based on the first power, and variably control at least one parameter of light generated by the at least one</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	<p>second power to the at least one LED based on the first power, wherein:</p> <p>the A.C. dimmer circuit includes a triac responsive to the user interface so as to variably control a duty cycle of an A.C. signal and thereby vary the first power; and the at least one <b>controller</b> is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface.</p>	<p>Functions:</p> <ul style="list-style-type: none"> <li>• receive first power from an alternating current (A.C.) dimmer circuit</li> <li>• provide second power to the at least one LED based on the first power</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in FIG. 7 and described in the</p>	<p>LED in response to operation of the user interface.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '399 Patent at 17:7-48.</p>



CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
60	<p>The illumination apparatus of claim 59, wherein the at least one parameter of the light that is variably controlled by the at least one <b>controller</b> in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit or component that controls”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive first power from an alternating current (A.C.) dimmer circuit</li> <li>• provide second power to the at least one LED based on the first power</li> </ul>	<p>Means plus function term.</p> <p>Function: receive first power from an alternating current (A.C.) dimmer circuit, provide second power to the at least one LED based on the first power, and variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface wherein the one parameter includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<ul style="list-style-type: none"> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the</p>	<p>equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '399 Patent at 17:7-48.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	

**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 7,352,138**

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
1	<p>An illumination apparatus, comprising:  at least one LED; and  at least one <b>controller</b> coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one <b>controller</b> further configured to provide power to the at least one LED based on the power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as illustrated in FIG. 3 and described in the specification, including the exemplary embodiments</p>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal.</p> <p>Structure: Components depicted in Fig. 4, or Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '138 Patent at 17:9-50.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>of those components as shown in FIG. 4 and described in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(c) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
9	The apparatus of claim 2, wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one <b>controller</b> is configured to variably control at least one parameter of light generated by the at least one	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112,</p>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	LED in response to operation of the user interface.	<p>¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the</p>	<p>power-related signal, and variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '138 Patent at 17:9-50.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;  and/or structural equivalents thereof.	
10	The apparatus of claim 9, wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one <b>controller</b> is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"  It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:  Functions: <ul style="list-style-type: none"> <li>receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> </ul>	Means plus function term.  Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.  Structure: Components depicted in FIG. 6; or the components

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<ul style="list-style-type: none"> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> <li>• variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal</li> </ul> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11</p>	depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to '138 Patent at 17:9-50.



CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		(for the drive circuitry); and described in the specification;  and/or structural equivalents thereof.	
11	The apparatus of claim 9, wherein the at least one parameter of the light that is variably controlled by the at least one <b>controller</b> in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit or component that controls"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response</li> </ul>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface wherein the one parameter includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p>	<p>thereof, wherein the processor 102 in Fig. 7 is programmed according to '138 Patent at 17:9-50.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		and/or structural equivalents thereof.	
20	The apparatus of claim 9, wherein the at least one <b>controller</b> includes:	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit or component that controls”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</li> <li>• provide power to the at least one LED based on the power-related signal</li> <li>• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface</li> </ul> <p>Structure: may comprise any of the</p>	<p>Means plus function term.</p> <p>Function: receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, provide power to the at least one LED based on the power-related signal, and variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface.</p> <p>Structure: Components depicted in FIG. 6; or the components depicted in FIGs. 8-11 (power circuitry and drive circuitry), and structural equivalents thereof, wherein the processor 102 in Fig. 7 is programmed according to ’138 Patent at 17:9-50.</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>following:</p> <p>(c) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(d) controller 204B as illustrated in in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
20	<p>an <b>adjustment circuit</b> to variably control the at least one parameter of light based on the varying power-related signal; and</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “A circuit that adjusts”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p>	<p>Means plus function term.</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: the components of adjustment circuit 208 that are</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 6;</p> <p>(b) processor 102, power circuitry 108, and drive circuitry 109 as illustrated in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for power circuitry including adjustment circuit 208 of FIG. 6) and described in the specification and either FIGs. 9 or 10 or 11 (for the drive circuitry) and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	<p>shown in FIG. 6 and structural equivalents thereof</p>
20	<b>power circuitry</b> to provide at least the power to the at least	Plain and ordinary meaning; however, to the extent that the Court deems a	Means plus function term.

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	one LED based on the varying power-related signal.	<p>construction is required: "Components of a circuit that provides power"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: provide power to the at least one LED based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as illustrated in FIG. 3 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 4 and described in the specification, and as further illustrated in FIG. 5, including the exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) power circuitry 108 as illustrated in FIG. 7 and described in the specification, including the exemplary</p>	<p>Function: provide at least the power to the at least one LED based on the varying power related signal.</p> <p>Structure: Components in Fig. 6 (402, 404, 408), and its structural equivalents</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>embodiments of power circuitry 108 as shown in FIG. 8 and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
21	<p>The apparatus of claim 20, wherein the <b>power circuitry</b> includes: a rectifier to receive the power-related signal and provide a rectified power-related signal; a low pass filter to filter the rectified power-related signal; and a DC converter to provide the power to at least the at least one LED based on the filtered rectified power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: “Components of a circuit that provides power”</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: provide power to the at least one LED based on the varying power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as illustrated in FIG. 3 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 4 and described in the specification, and</p>	<p>Means plus function term.</p> <p>Function: provide at least the power to the at least one LED based on the varying power related signal.</p> <p>Structure: Components in Fig. 6 (402, 404, 408), and its structural equivalents</p>

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>as further illustrated in FIG. 5, including the exemplary embodiments of those components as shown in FIG. 6 and described in the specification;</p> <p>(b) power circuitry 108 as illustrated in FIG. 7 and described in the specification, including the exemplary embodiments of power circuitry 108 as shown in FIG. 8 and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	
22	<p>The apparatus of claim 21, wherein the <b>adjustment circuit</b> is coupled to the DC converter and is configured to variably control the at least one LED based on the filtered rectified power-related signal.</p>	<p>Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A circuit that adjusts"</p> <p>It is Signify's position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Functions:</p> <ul style="list-style-type: none"> <li>• variably control the at least one parameter of light based on the varying power-related signal.</li> <li>• variably control the at least one</li> </ul>	<p>Means plus function term.</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal.</p> <p>Structure: the components of adjustment circuit 208 that are shown in FIG. 6 and structural equivalents thereof</p>



CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
		<p>LED based on the filtered rectified power-related signal.</p> <p>Structure: may comprise any of the following:</p> <p>(a) adjustment circuit 208 as illustrated in FIG. 5 and described in the specification, including the exemplary embodiments of those components as shown in FIG. 6;</p> <p>(b) processor 102, power circuitry 108, and drive circuitry 109 as illustrated in FIG. 7 and described in the specification, including exemplary embodiments of those components as shown in FIG. 8 (for power circuitry including the adjustment circuit 208 of FIG. 6) and described in the specification and either FIGs. 9 or 10 or 11 (for the drive circuitry) and described in the specification;</p> <p>and/or structural equivalents thereof.</p>	



**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 8,063,577**

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
1	<p>A driver circuit for operating a light emitting diode, the driver circuit being configured to control a current to be supplied to the LED, the driver circuit comprising:</p> <p>a set of input terminals for receiving a supply voltage;</p> <p>a resonant capacitor;</p> <p>a transformer, a primary winding of the transformer and the resonant capacitor being <b>coupled in series</b> to the set of input terminals;</p> <p>a rectifier means coupled to the secondary winding of the transformer for rectifying an alternating load voltage on the secondary winding of the transformer;</p>	Plain and ordinary meaning	“electrical current pass through [a primary winding of the transformer and the resonant capacitor] in turn without branching”
1	<p>an output circuit coupled to the rectifier means for receiving a rectified voltage, the output circuit comprising a buffer circuitry and a set of output terminals for coupling the LED to the driver circuit,</p>	Plain and ordinary meaning	“electrical current pass through [an inductor and the set of output terminals] in turn without branching”

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	<p>wherein the buffer circuitry comprises an inductor <b>connected in series</b> with the set of output terminals, and the value of the inductor is selected to provide a substantially constant current through the LED.</p>		

**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 7,348,604**

<b>CLAIM</b>	<b>TEXT OF CLAIM</b>	<b>PLAINTIFFS' PROPOSED CONSTRUCTION</b>	<b>DEFENDANTS' PROPOSED CONSTRUCTION</b>
1	A <b>light-emitting module</b> comprising:	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
1	(a) a thermally conductive substrate having one or more light-emitting elements <b>thermally connected</b> thereto, the substrate configured to operatively couple a source of power to the one or more light-emitting elements, thereby providing a means for activation of the one or more light-emitting elements;	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "Transfer via thermal conduction, convection, or radiation."	"connected via thermal conduction, convection, or radiation; not thermally insulated"
1	(b) a heat dissipation element <b>thermally coupled</b> to the thermally conductive substrate; and	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "Transfer via thermal conduction, convection, or radiation."	"connected via thermal conduction, convection, or radiation; not thermally insulated"
1	(c) a housing element including <b>fastening means</b> for <b>detachably coupling</b> the	Governed by § 112 ¶ 6.  Structure: fastening means as described at 5:18-24, 6:18-24, 7:25-	Means plus function term.

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	housing element to the heat dissipation element,	26, 7:42-51, 7:55-67 and/or identified by reference numeral 450 in FIG. 4, and equivalents thereof.  Function: detachably coupling the housing element to the heat dissipation element.	Function: releasably connecting the housing element to the heat dissipation element.  Structure: The tabs 450 shown in Fig. 4 and described in col. 7:42-51, and their structural equivalents.
1	said substrate being enclosed between the heat dissipation element and said housing element, said <b>housing element including a transparent region</b> enabling transmission of light emitted by the one or more light-emitting elements therethrough.	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "A housing part including a transparent region"	"a single structure having a transparent region"
2	The <b>light-emitting module</b> according to claim 1, further comprising one or more optical elements for manipulation of the light emitted by said one or more light-emitting elements, said optical element optically coupled to said housing element.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
3	The <b>light-emitting module</b> according to claim 2, wherein the one or more optical elements and the housing element are integrally formed.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
4	The <b>light-emitting module</b> according to claim 2, wherein the optical element is a reflective element, refractive element, diffractive element, diffusive element or holographic element.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
5	The <b>light-emitting module</b> according to claim 4, wherein the optical element is a diffuser, lenticular element, Fresnel array or lens.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
8	The <b>light-emitting module</b> according to claim 1, wherein the substrate is a metal core printed circuit board or a FR4 board.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
9	The <b>light-emitting module</b> according to claim 1, wherein	Term appears in preamble, no construction required; however, to	Preamble is limiting.

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	the substrate includes internal electrical conductive paths.	the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
10	The <b>light-emitting module</b> according to claim 1, wherein the substrate includes circuit traces forming electrical conductive paths.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"
12	The <b>light-emitting module</b> according to claim 1, wherein a sealant substance is positioned between the housing element and the heat dissipation element for environmental sealing between the housing element and the heat dissipation element.	Term appears in preamble, no construction required; however, to the extent that the Court deems a construction is required: "A self-contained assembly of electronic components and circuitry for emitting light"	Preamble is limiting.  Proposed construction: "A packaged light emitting device designed for use with other light emitting devices"



**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. 9,709,253**

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
16	<p>A downlight module, comprising:</p> <p><b>a heat sink comprising an upper surface and a lower surface;</b></p> <p>at least one light emitting diode (LED) in thermal communication with the heat sink;</p> <p>a housing defining a cavity therein, the housing being coupled to the heat sink;</p> <p>a driver electrically coupled to the at least one LED; and</p> <p>an adapter comprising:</p> <p>at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and</p> <p>at an opposing end of the adapter, a quick-connect connector configured to be connected to the driver,</p> <p>wherein the at least one LED emits light through the cavity.</p>	Plain and ordinary meaning	“a heat sink having a surface at a top end and another surface at a bottom end”

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
30	<p>A downlight module, comprising:</p> <p><b>a heat sink comprising an upper surface and a lower surface;</b></p> <p>at least one light emitting diode (LED) thermally coupled to the heat sink;</p> <p>a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED;</p> <p>a driver electrically coupled to the at least one LED; and</p> <p>an adapter comprising:</p> <p>at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and</p> <p>at an opposing end of the adapter, a quick-connect</p>	Plain and ordinary meaning	“a heat sink having a surface at a top end and another surface at a bottom end”

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	connector configured to be connected to the driver, wherein the at least one LED emits light through the cavity.		

**PROPOSED CONSTRUCTIONS OF U.S. PATENT NO. RE49,320**

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
1	A lighting device, comprising a light source comprising one or more light-emitting diodes <b>configured for generating light along an optical axis,</b>	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "configured for generating light along a straight line passing through the optical center."	"the beams from one or more light-emitting diodes are set up to be parallel to a single optical axis"
1	a heat sink comprising a metal with an electrical resistivity being less than 0.01 $\Omega$ m. and configured for removing heat produced by the light source, <b>the heat sink forming at least a portion of an outer enclosure,</b> a RF communication circuit, and a first antenna connected to the RF communication circuit for communicating RF control signals and arranged within the outer enclosure, wherein the lighting device comprises one or more metallic components having an extension larger than at least 1/10 of a wavelength of the RF control signals and arranged below a virtual	Plain and ordinary meaning; however, to the extent that the Court deems a construction is required: "the heat sink forms at least a part of the outer enclosure"	"at least a segment of an outer enclosure is formed by the heat sink such that the heat sink is exposed to outside"

CLAIM	TEXT OF CLAIM	PLAINTIFFS' PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION
	plane drawn orthogonal to the optical axis and going through the first antenna.		